

**Before the
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554**

In the Matter of)	
)	
Review of Part 87 of the Commission's)	WT Docket No. 01-289
Rules Concerning the Aviation Radio Service)	

REPLY COMMENTS OF INMARSAT VENTURES LIMITED

Inmarsat Ventures Limited ("Inmarsat") submits these Reply Comments in response to comments filed in the above-captioned proceeding.¹ Inmarsat continues to urge the Commission to (i) include the lower half of the L-Band (1525-1545 MHz and 1626.5-1646.5 MHz) within the frequency ranges in which AMS(R)S may be provided pursuant to Part 87 of the Commission's rules; (ii) ensure that it applies priority and preemptive access requirements for AMS(R)S consistently, so that all bands in which AMS(R)S may be provided are subject to the same regulatory framework; and (iii) update its Part 87 rules to allow the latest types of technology to be used to provide AMS(R)S and other aviation services.

Moreover, Inmarsat supports the proposal of Rockwell Collins, Inc. to amend Sections 87.131, 87.133, 87.137, 87.139(i)(1) and 87.139(i)(3), 87.141 and 87.145 of the Commission's rules to allow greater flexibility for aircraft terminals in the aviation services.² Inmarsat understands that Rockwell Collins is filing additional clarifications to its proposed amendments today that will further facilitate the authorization of higher-bandwidth services, such as Swift64 and SwiftBroadband, on aircraft. Inmarsat supports these clarifications.

¹ *Review of Part 87 of the Commission's Rules Concerning the Aviation Radio Service*, Second Report and Order and Second Further Notice of Proposed Rule Making, WT Docket No. 01-289, FCC 06-148 (rel. Oct. 10, 2006).

² *See* Comments of Rockwell Collins, Inc. at 2-8.

Furthermore, Inmarsat requests that the Commission make any additional revisions to Part 87 necessary to ensure that AMS(R)S is authorized in the lower half of the L-Band.

In addition, Inmarsat reiterates its concern that extending Part 87 to cover new frequency bands would present particular challenges if AMS(R)S is authorized to be provided in bands in which the uplink or downlink is allocated to MSS on a secondary basis. In particular, with regard to the possible use of AMS(R)S systems in the 1610-1626.5 MHz band,³ MSS is secondary on the downlink both domestically and internationally. Therefore, mobile earth terminals in that band cannot claim protection from harmful interference from operations of a primary service. In the event that the Commission authorizes AMS(R)S in the 1610-1626.5 MHz band, such allocation must not effectively “elevate” that band to primary status based on the authorization under Part 87 to provide AMS(R)S.

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For the reasons discussed above and in Inmarsat’s Comments, Inmarsat respectfully requests that the Commission amend Part 87 of its rules to facilitate the introduction and proliferation of new, innovative aviation services to the United States.

Respectfully submitted,

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³ See Comments of Iridium Satellite LLC at 1.